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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

CureIS Healthcare, Inc.,

Plaintiff,

V.

Epic Systems Corporation

Defendant

Case No.: 3:25-cv-04108-MMC

**DEFENDANT'S ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIAL  
SHOULD BE SEALED**

Judge: Hon. Maxine M. Chesney

1 Pursuant to Civil Local Rule 7-11 and 79-5(f), Defendant Epic Systems Corporation  
 2 (“Epic”) submits this administrative motion to consider whether another party’s material should  
 3 be sealed (“Administrative Motion”), filed in connection with Defendant’s Notice of Motion and  
 4 Motion to Transfer Venue to the Western District of Wisconsin Pursuant to 28 U.S.C. § 1404(a)  
 5 (Epic’s “Motion to Transfer Venue”), Declaration of Lauren A. Moskowitz in Support of  
 6 Defendant Epic Systems Corporation’s Motion to Transfer Venue (“Moskowitz Declaration”),  
 7 Exhibits C and D accompanying the Moskowitz Declaration, and the Declaration of Jennifer  
 8 Peterson in Support of Defendant Epic Systems Corporation’s Motion to Transfer Venue  
 9 (“Peterson Declaration”). The portions of documents Epic seeks to temporarily file under seal  
 10 are listed below:

Document	Corresponding Page and Line Number(s)
Motion to Transfer Venue	Page 5, Lines 6-8
Motion to Transfer Venue	Page 6, Line 21
Motion to Transfer Venue	Page 6, Lines 23-24
Motion to Transfer Venue	Pages 6-7, Lines 25-1, Fn. 3
Motion to Transfer Venue	Page 12, Lines 13, 15
Motion to Transfer Venue	Page 13, Lines 25-28
Motion to Transfer Venue	Page 14, Line 2
Motion to Transfer Venue	Page 14, Lines 4-6, 8
Motion to Transfer Venue	Page 14, Line 10, Fn. 6
Motion to Transfer Venue	Page 14, Line 12
Motion to Transfer Venue	Page 15, Line 6
Moskowitz Declaration	Page 2, Line 1
Moskowitz Declaration	Page 2, Line 5
Exhibit D to Moskowitz Declaration	Document in its entirety
Exhibit E to Moskowitz Declaration	Document in its entirety
Peterson Declaration	Page 3, Lines 8-9
Peterson Declaration	Page 4, Lines 4-6

Document	Corresponding Page and Line Number(s)
Peterson Declaration	Page 4, Lines 8-10
Peterson Declaration	Page 4, Lines 12-14
Peterson Declaration	Page 4, Lines 15-17
Peterson Declaration	Page 4, Lines 19-21
Peterson Declaration	Page 4, Lines 22-24
Peterson Declaration	Page 4, Lines 25-27

Magistrate Judge Kim previously granted CureIS HealthCare, Inc.’s (“CureIS”) request to redact the names of CureIS’s customers named in the Complaint. (See Dkt. No. 5 at 1.) Epic reserves the right and intends to file a motion to seek the unsealing of the customer-identifying information that Magistrate Judge Kim previously permitted. Epic disputes CureIS’s prior representation submitted in connection with CureIS’s Administrative Motion to File Under Seal Portions of Plaintiff’s Complaint that it “goes to great lengths to keep the identities of its customers confidential.” (Dkt. No. 2 at 2.) Among other reasons, CureIS has publicly touted its relationships with a number of the redacted customers on its own website for years.

Nonetheless, given that Magistrate Judge Kim’s order currently remains in place, Epic provisionally files portions of its Motion to Transfer, Moskowitz Declaration, Exhibits C and D accompanying the Moskowitz Declaration, and Peterson Declaration under seal because they reflect information regarding the same customers covered by that order, including the business addresses of those customers and the names of Epic employees who are specifically assigned to those customers, whose identities could potentially be used to reveal the identities of the underlying customers. Epic reserves the right and intends to oppose, under Rule 79-5(f)(4), any submission CureIS makes to support sealing of this information under Rule 79-5(f)(3).

1 Dated: June 17, 2025

Respectfully submitted,

2 By: /s/ Lauren A. Moskowitz

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